



Department of Veterans Affairs

Financial Policy

Volume VIII

Cash Management

Chapter 1

Certifying and Disbursing Officials/Officers

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0101 Overview

This chapter establishes the Department of Veterans Affairs’ (VA) financial policies for cash management. This includes prohibited dual functions, shortages of funds, and reporting of irregularities.

Key points covered in this chapter:

- Under 31 U.S.C. § 3528, Certifying Officials may be responsible for reimbursing the Federal government for any payment determined to be illegal, improper, or incorrect;
- All irregularities affecting the accounts of Certifying/Disbursing Officers or VA employees will be reported to the Executive Director of the Financial Services Center (FSC) for review and further action;
- Treasury uses form FS2958 to authorize the Head of the Agency (HoA) and other officials appointed by the HoA to delegate the authority to expend federal funds;
- Treasury’s Fiscal Service requires a new FS2958 be completed any time there is a change in SECVA; and
- Treasury’s Fiscal Service requires the use of form FS210 to designate individuals to perform specific functions such as a Certifying Official.

0102 Revisions

Section	Revision	Office	Reason for Change	Effective Date
Heading	Name of chapter has changed to reflect subject matter	OFP (047G)	Leadership Directed	February 2022
Various	Reformatted to new policy format and completed five-year update	OFP (047G)	Required full policy update/review	February 2022
Various	Removed all references to CCDM	OFP (047G)	CCDM no longer exists	February 2022
Various	Updated and edited every section to reflect policies high level point of view.	OFP (047G)	Required for current OFP format	February 2022
Section 0104	Removed reference to OALC	OFP (047G)	Not mentioned anywhere in policy	February 2022

Section	Revision	Office	Reason for Change	Effective Date
Section 0105	Moved all procedures from Section 0105 to Appendix A	OFP (047G)	Required for current OFP format	February 2022
Section 100501	Changed section name from Procedures to Activities	OFP (047G)	Leadership Directed	February 2022
010504 Designating Certifiers	Inserted language about Comptroller General and relief of responsibility	OFP (047G)	Leadership Directed	February 2022
Appendix A	Removed procedures from policy and incorporated into Appendix A	OFP (047G)	Full review	February 2022
Various	Reformatted to new policy format and completed five-year update	OFP (047G)	Reorganized chapter layout	March 2016
0101 Overview	Updated to include reorganization	OFP (047G)	Leadership organizational change	March 2016

0103 Definitions

Certification – The act of verifying the accuracy and legality of an invoice and supporting records.

Improper payment – A payment that was made in an incorrect amount under statutory, contractual, administrative, or other legally applicable requirements. The term improper payment includes any payment to an ineligible recipient, any payment for an ineligible good or service; any duplicate payment; any payments for a good and service not received, except for those payments authorized by law; and any payment that does not account for credit for applicable discounts. Improper payments include monetary loss improper payments and non-monetary loss improper payments. The improper payment amounts, and unknown payment amounts will be reported as required by OMB Circular A-123, Appendix C and/or any additional OMB guidance.

Invoice – A written or electronically transmitted document requesting payment. A

proper invoice meets the requirements of the Prompt Payment Act under 5 C.F.R. § 1315. The term “invoice” also includes:

- Receiving reports and delivery tickets when contractually designated as invoices; and
- Non-vendor payment requests (e.g., Veterans benefits, employee travel, salary, etc.)

Secure Payment System (SPS) – A Treasury system used by federal government agencies to schedule and certify payments securely.

0104 Roles and Responsibilities

Under Secretaries, Assistant Secretaries, Other Key Officials, Administration and Staff Office CFO’s and Fiscal Officers are responsible for ensuring compliance with the policies outlined in this chapter.

Authorizing Officials (delegators) are responsible for designating and managing the certifying officers.

Certifying Officers are responsible for approving schedules of payments transmitted to Treasury for disbursements and for errors made in the processing of the voucher schedule, such as the number of individual vouchers and total dollar amount of vouchers submitted to Treasury for payment.

Certifying Officials are responsible for certifying each invoice for payment and for ensuring that the invoice is correct, accurate and in accordance with the related obligation document. Typically, a Contracting Officer Representative (COR) or their technical representative performs this function for invoices related to a contract.

Chief of the Finance Office is responsible for all fiscal activities at each facility and will maintain sufficient records as required in support of fiscal and accounting functions.

Disbursing Officers are Federal Government employees authorized by 31 U.S.C. § 3321 and § 3325 to perform financial transactions (deposit collections, disburse checks, and transfer funds between agencies). There are different types of disbursing officers, specifically, there are Treasury Disbursing Officers (TDO), non-Treasury Disbursing Officers (NTDO), and NTDOs located overseas, also referred to as United States Disbursing Officers (USDOS).

Financial Services Center (FSC) located in Austin, Texas, is a franchise fund (fee-for-service) organization within VA that offers a wide range of financial and accounting products and services to both VA and other Government agencies.

Treasury Regional Financial Centers (RFC) process and disburse payments, including Veteran’s benefits, Federal Salary, vendor, tax refunds, and other miscellaneous payments.

0105 Policies

010501 Establishing Roles

- A. Authorizing Officials (delegators) are designated by the Head of Agency, delegations of this authority are reported to Treasury using the Bureau of Fiscal Service Form 2958 (FS2958).
- B. VA will establish roles for Certifying Officers, Certifying Officials and Disbursing Officers, Treasury requires the use of form FS210 when designating individuals to perform these disbursement related functions. The FS210 must be signed by an individual who has been delegated on a FS2958 as an Authorizing Official.
- C. Certifying Officers:
1. Will be appointed through a delegation of authority from an Authorizing Official and designated specific duties as outlined on Treasury form FS210;
 2. Shall certify payments (e.g., batch payments) to Treasury using Treasury's SPS system;
 3. Must be Federal government employees and U.S. citizens;
 4. Cannot serve as both the Authorizing (Approving) Official and the Disbursing Officer; and
 5. May be monetarily liable for any payments resulting from illegal, improper, or incorrect certifications under 31 U.S.C. § 3528, and other applicable laws.
 6. Most Certifying Officers are located at the FSC or the VBA Finance Center at Hines.
- D. Certifying Officials:
1. Are responsible for verifying information stated on the invoice, supporting records, the correctness of a certified invoice, and the legality of a proposed payment under the appropriation or fund involved; and
 2. May be monetarily liable for any payments resulting from illegal, improper, or incorrect certifications under 31 U.S.C. § 3528, and other applicable laws.

E. Disbursing Officers:

1. Are appointed by VA's Chief Disbursing Officers (through administrations and staff offices) with designated disbursing authority.
2. Are primarily agent cashiers.
3. Mainly process disbursements that cannot be made via electronic funds transfer (EFT).
4. Certify disbursements and report public funds, as required by 31 U.S.C. § 3321 and § 3325.

F. Authorizing Officials will ensure that duties are properly segregated. For example, an employee cannot perform both certifying and disbursing functions.

010502 Contacting Treasury

- A. The Department of Treasury Financial Manual (TFM) volume I, Part 4, Chapter 3000 provides procedures and forms needed to:
- Inform Fiscal Service of the Head of Federal Entity;
 - Delegate designation authority to designating officials; and
 - Designate individuals to the positions of Certifying Officers (COs) for the Secure Payment System (SPS) and the Automated Standard Application for Payments (ASAP); SPS Data Entry Operators (DEO); and designated agents.
- B. The FS2958 is used for the Head of the Agency (HoA) and Authorizing officials appointed by the HoA to delegate authority to expend federal funds, and to certify the disbursement of such funds through a Treasury disbursing office.
- C. The FS210 is used for designating Certifying Officers (CO) and Data Entry Operators (DEO). FS210's must be signed by individuals whose delegation of authority has been reported to Treasury on an FS2958.
- D. FSC will submit the Head of Agency Self Designation FS2958, to Treasury's Bureau of Fiscal Service (FS) as well as the designations for the VA CFO, and the Heads of each Administration. Each Administration may submit their own lower delegations.
- E. FSC will notify the Treasury's Bureau of Fiscal Service (FS) of all planned changes in organizational structure or operations that may affect disbursing services performed by the Treasury's Regional Financial Center (RFC).

010503 Reporting of Irregularities

- A. The Chief of the Local Finance Office will report irregularities to the Administration or Staff Office CFO.
- B. Examples of reportable irregularities include but are not limited to:
 - shortages due to physical loss of public or patient funds;
 - illegal activities resulting from fraud or forgery;
 - alteration of vouchers and other improper practices;
 - improper accounting for receipts, disbursements, cash advances; or
 - any other irregularity which involves accountability to the United States.
- C. Administration and Staff Office CFO's will report irregularities affecting the accounts of Certifying/Disbursing Officers or VA employees, to the Executive Director of the FSC.
- D. FSC will track irregularities and follow up periodically with station contacts until all irregularities are resolved or if required administrative/disciplinary action has been taken.
- E. All documentation related to reported irregularities will be maintained for management review and audit purposes.

010504 Reporting Shortages of Funds

- A. The director of a VA facility, station, or office may act as a settlement officer for claims arising from a shortage of funds valued at \$199.99 or less for agent cashier funds, due to the action of an employee at his or her station, unless the loss involves the director.
- B. The VISN, MISN or Regional Office chief of the finance office or Administration CFO will be the designated settlement officer for all claims arising from any loss involving a director of a VA facility, station, or office.
- C. For shortage of agent cashier funds greater than \$199.99, refer to VA Financial Policy Volume VIII, Chapter 3, Agent Cashier Accountability Policy, for VA's financial policies relating to a fund shortage of this magnitude.

010505 Liability

- A. VA's Certifying Officers and Certifying Officials may be monetarily liable for any payments resulting from illegal, improper, or incorrect certifications under 31 U.S.C. § 3528, and other applicable laws.

- B. Certifying Officers, Certifying Officials, and Disbursing Officers are responsible for proving, in the relief of liability process, that it is more likely than not that they either were not negligent or were not the proximate cause of the fiscal irregularity.
- C. Certifying Officers and Certifying Officials acting in good faith and conformity with an authorized automated system of controls will not be held liable for any certification or payment that was not subject to specific examination because of the automated controls. Information showing that the system on which Certifying Officers or Certifying Officials rely is functioning properly and evidence that reviews are made periodically to determine that the automated systems are operating effectively and can be relied on to produce payments that are accurate and legal, may be used by the SECVA to relieve liability.
- D. When an improper or incorrect payment is certified by a Certifying Officer or Certifying Official, a request for relief can be submitted to Secretary of Veterans Affairs (SECVA) for determination.
- E. In accordance with a 1991 DOJ opinion, SECVA will perform the functions of the Comptroller General found in 31 U.S.C. § 3528 and will consider the items below when evaluating the relief of liability:
- The obligation was incurred in good faith;
 - No law specifically prohibited the payment;
 - The U. S. Government received value for the payment; and
 - Evidence that the payments were accurate and legal relating to the automated system rather than the individual transactions.

0106 Authorities and References

[31 U.S.C § 3321, Disbursing Authority in the Executive Branch](#)

[31 U.S.C. § 3325, Vouchers](#)

[31 U.S.C. § 3528, Responsibilities and Relief from liability of Certifying Officials](#)

[44 U.S.C. Chapter 31, Records Management by Federal Agencies](#)

[Treasury Financial Manual, Volume I, Part 4A: Payment-Related Activities within the Authority Granted to the U.S. Chief Disbursing Officer \(CDO\)](#)

[Treasury Financial Manual Volume I, Chapter 4700, Agency Reporting Requirements for the Financial Report of the United States Government](#)

[Treasury Financial Manual Volume I, Part 4, Chapter 3000, Requirements for Scheduling Payments Disbursed by the Bureau of the Fiscal Service](#)

[U.S. Government Accountability Office \(GAO\), Title 7, Policy and Procedures Manual for Guidance of Federal Agencies, Fiscal Guidance](#)

0107 Rescissions

VA Financial Policy Volume VIII, Chapter 1 Administrative Fiscal Policies and Procedures, dated September 2013

0108 Questions

Questions concerning this financial policy should be directed to the following points of contact:

VHA	VHA CFO Accounting Policy (10A3A) (Outlook)
VBA	VAVBAWAS/CO/OPERATIONS (Outlook)
All Others	OFP Accounting Policy (Outlook)